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JOHNNY M. HUNT,	:
	:
Plaintiff,	:
	:
-against-	:
	:
SOUTHERN BAPTIST CONVENTION,	:
GUIDEPOST SOLUTIONS LLC, and	:
EXECUTIVE COMMITTEE OF THE SOUTHERN	:
BAPTIST CONVENTION,	:
	:
Defendants.	:
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Defendant Guidepost Solutions LLC (“Guidepost”) makes the following initial disclosures (the “Disclosures”) pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Guidepost provides the Disclosures to the best of its knowledge and on the basis of the information available as of this date. Guidepost reserves the right to alter, amend, supplement, augment, or otherwise change the Disclosures as appropriate. No response or lack of response herein shall be understood to limit the legal theories, factual contentions, or evidence to be employed, relied upon, or presented by Guidepost during any proceeding in this case.

**Initial Disclosure (A)(i):**

Guidepost identifies the following individuals likely to have discoverable information (along with the subjects of that information) that may be used to support its claims or defenses:

<b>Name</b>	<b>Subjects</b>
Samantha Kilpatrick, Sr. Managing Director, Guidepost	<ul style="list-style-type: none"><li>• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses</li><li>• Guidepost's drafting, editing, and finalization of the relevant portion of the Report</li></ul>
Russell Holske Jr., Sr. Managing Director, Guidepost	<ul style="list-style-type: none"><li>• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses</li><li>• Guidepost's drafting, editing, and finalization of the relevant portion of the Report</li></ul>
Julie Myers Wood CEO, Guidepost	<ul style="list-style-type: none"><li>• Guidepost's structure, operations, policies, and procedures</li><li>• Scope of SBC's engagement of Guidepost</li></ul>
Krista Tongring, Sr. Managing Director, Guidepost	<ul style="list-style-type: none"><li>• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses</li><li>• Guidepost's drafting, editing, and finalization of the Report</li></ul>
Johnny M. Hunt	<ul style="list-style-type: none"><li>• Complainant's allegations against Plaintiff</li><li>• Guidepost's investigation of Complainant's allegations against Plaintiff</li><li>• Plaintiff's claims in this action</li></ul>
Complainant	<ul style="list-style-type: none"><li>• Allegations against Plaintiff</li><li>• Guidepost's investigation of allegations against Plaintiff</li></ul>
Complainant's Husband	<ul style="list-style-type: none"><li>• Complainant's allegations against Plaintiff</li><li>• Guidepost's investigation of Complainant's allegations against Plaintiff</li></ul>
Roy Blankenship	<ul style="list-style-type: none"><li>• Complainant's allegations against Plaintiff</li><li>• Communications with Plaintiff, Complainant, and Complainant's Husband</li><li>• Guidepost's investigation of Complainant's allegations against Plaintiff</li></ul>
Witness 1	<ul style="list-style-type: none"><li>• Complainant's allegations against Plaintiff</li></ul>
Witness 2	<ul style="list-style-type: none"><li>• Complainant's allegations against Plaintiff</li></ul>

Witness 3	<ul style="list-style-type: none"> <li>• Complainant's allegations against Plaintiff</li> </ul>
Janet Hunt	<ul style="list-style-type: none"> <li>• Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>
Jim Law	<ul style="list-style-type: none"> <li>• Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>
Kevin Ezell, President, NAMB	<ul style="list-style-type: none"> <li>• Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>
Anna Gage	<ul style="list-style-type: none"> <li>• Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>
Christopher Lee	<ul style="list-style-type: none"> <li>• Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>
Matt Lawson	<ul style="list-style-type: none"> <li>• Plaintiff's confession and other communications regarding Complainant and marital counseling</li> </ul>
Mark Hoover	<ul style="list-style-type: none"> <li>• Plaintiff's confession and other communications regarding Complainant and marital counseling</li> </ul>
Mike Whitson	<ul style="list-style-type: none"> <li>• Plaintiff's confession and other communications regarding Complainant and marital counseling</li> </ul>
Steven Kyle	<ul style="list-style-type: none"> <li>• Plaintiff's confession and other communications regarding Complainant and marital counseling</li> </ul>
Benny Tate	<ul style="list-style-type: none"> <li>• Plaintiff's confession and other communications regarding Complainant and marital counseling</li> </ul>
Members of the SBC Executive Committee	<ul style="list-style-type: none"> <li>• Facts regarding the scope of the Report as it concerns Plaintiff</li> </ul>
Bruce Frank	<ul style="list-style-type: none"> <li>• Information regarding SBC's engagement of Guidepost</li> <li>• Facts regarding the scope of the Report as it concerns Plaintiff</li> </ul>
Rolland Slade	<ul style="list-style-type: none"> <li>• Information regarding SBC's engagement of Guidepost</li> <li>• Facts regarding the scope of the Report as it concerns Plaintiff</li> </ul>
John E. Carswell	<ul style="list-style-type: none"> <li>• Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>
Eddie Carswell	<ul style="list-style-type: none"> <li>• Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>
Pete Hixson	<ul style="list-style-type: none"> <li>• Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>

John E. Carswell III	<ul style="list-style-type: none"> <li>Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>
Shane Pruitt	<ul style="list-style-type: none"> <li>Plaintiff's communications regarding Plaintiff's encounter with Complainant</li> </ul>

**Initial Disclosure (A)(ii):**

Guidepost identifies the following documents in its possession, custody, or control, among others, that may be used to support its claims or defenses:

- Documents related to SBC's engagement of Guidepost
- Documents collected or generated during Guidepost's investigation of Complainant's allegations against Plaintiff, including notes and recordings pertaining to said allegations

**Initial Disclosure (A)(iii):**

Not applicable

**Initial Disclosure (A)(iv):**

Guidepost identifies the following insurance agreements or other agreements to satisfy all or part of a possible judgment in this action or to indemnify or reimburse Guidepost for payments made to satisfy such judgment: SBC Engagement Agreement, Section 5.1.

Dated: Nashville, Tennessee  
New York, New York  
June 22, 2023

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served via electronic mail on the following:

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on this 22<sup>nd</sup> day of June, 2023.

s/Katharine R. Klein